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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re:

Vitaris Rehabilitation, LLC,

Debtor.  
-----X

In re:

Vitaris Rehabilitation Bay Shore, LLC,

Debtor.  
-----X

In re:

Vitaris Rehabilitation Bronx, LLC,

Debtor.  
-----X

In re:

Vitaris Rehabilitation Commack, LLC,

Debtor.  
-----X

In re:

Vitaris Rehabilitation East Side, LLC,

Debtor.  
-----X

Chapter 11

Case No. 11-74988

Chapter 11

Case No. 11-74989

Chapter 11

Case No. 11-74990

Chapter 11

Case No. 11-74991

Chapter 11

Case No. 11- 74992

-----X  
In re:

Vitaris Rehabilitation Garden City, LLC,  
Debtor.

Chapter 11

Case No. 11-74993

-----X

-----X  
In re:

Vitaris Rehabilitation Long Beach, LLC,  
Debtor.

Chapter 11

Case No. 11-74995

-----X

In re:  
Vitaris Rehabilitation Mount Sinai, LLC,  
Debtor.

Chapter 11

Case No. 11-74996

-----X

In re:  
Vitaris Rehabilitation West Side, LLC,  
Debtor.

Chapter 11

Case No. 11-74997

-----X

**MOTION OF DEBTORS PURSUANT TO BANKRUPTCY  
RULE 1015(b) FOR JOINT ADMINISTRATION OF CASES**

**TO: THE HONORABLE  
UNITED STATES BANKRUPTCY JUDGE**

Vitaris Rehabilitation, LLC, Vitaris Rehabilitation Bay Shore, LLC, Vitaris Rehabilitation Bronx, LLC, Vitaris Rehabilitation Commack, LLC, Vitaris Rehabilitation East Side, LLC, Vitaris Rehabilitation Garden City, LLC, Vitaris Rehabilitation Long Beach, LLC, Vitaris Rehabilitation Mount Sinai, LLC, and Vitaris Rehabilitation West Side, LLC, the above-captioned Debtors- (collectively “Vitaris” or “Debtors”) makes this application (the “Application”) pursuant to

Bankruptcy Rule 1015(b) for joint administration of their respective Chapter 11 cases (the “Motion”), and respectfully state and represent as follows:

#### Jurisdiction

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. §§ 157 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The Debtors continue to operate and manage their properties as debtors-in-possession pursuant to §§1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner or statutory committee has been appointed.

#### Background

3. On July14, 2011, (the “Filing Date”), each of the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.

4. The Debtors provide business support services, personnel, facilities, equipment, and supplies for the day-to-day operation of physical therapy and sports rehabilitation practices pursuant to the management service agreements. The Debtors own, manage and operate 8 outpatient physical therapy clinics in Nassau and Suffolk Counties and New York City that are professionally staffed by New York Physical and Occupational Therapy, PLLC.

#### Relief Requested

5 The Debtors by this Motion seek the joint administration of their Chapter 11 cases for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

6 Bankruptcy Rule 1015(b) provides:

If a joint petition or two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.

7. In these cases, the Debtors are “affiliates” as that term is defined in § 101(2) of the Bankruptcy Code.

8. Additionally, the Affidavit pursuant to Bankruptcy Rule 1007-4 filed simultaneously herewith, establishes that the joint administration of the Debtors’ respective estates is warranted and will ease the administrative burden on this Court and all parties in these Chapter 11 cases.

9. Many, if not virtually all, of the motions, applications, hearings and orders that will arise in these Chapter 11 cases will jointly affect all of the Debtors. For this reason, the Debtors respectfully submit that the interests of the Debtors, their creditors and other parties in interest would be best served by the joint administration of these Chapter 11 cases. In order to optimally and economically administer the Debtors’ pending Chapter 11 cases, such cases should be jointly administered for procedural purposes only, under the case number assigned to Debtor Vitaris Rehabilitation, L.L.C.

10. The Debtors also request that the Clerk of the Court maintain one (1) file and one (1) docket for all of the Debtors’ Chapter 11 cases, which file and docket shall be the file and docket for Debtor Vitaris Rehabilitation, L.L.C.

11. The Debtors further request that the caption of these Chapter 11 cases be modified as follows:

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

-----x

In re:

Vitaris Rehabilitation, LLC, et al ,

**Debtors.**

-----x

**Chapter 11  
Case No. 11-74988**

**(Jointly Administered)**

12. In addition, the Debtors seek the Court's direction that a notation substantially similar to the following proposed docket entry be entered on the docket of each of the Debtors' Chapter 11 cases, other than the docket of Debtor Vitaris Rehabilitation , L.L.C., to reflect the joint administration of these cases:

An Order has been entered in this case directing the consolidation and joint administration for procedural purposes only of the Chapter 11 cases. The docket in the Chapter 11 case of Vitaris Rehabilitation, L.L.C. , Case No. 11 -74988 should be consulted for all matters affecting this case.

13. Finally, the Debtors seek authority to file the monthly operating reports required by the U.S. Trustee on a consolidated basis, provided, however, that on such reports the Debtors shall indicate the disbursements separately for each individual Debtor as applicable. Such consolidated monthly operating reports will provide economies and efficiencies to the Debtors and their personnel without prejudice to any party in interest in or affected by these Chapter 11 cases.

14. The joint administration of these cases will permit the Clerk of the Court to use a single docket for all of the Chapter 11 cases and to combine notices to creditors and parties in interest.

15. The rights of respective creditors of the Debtors will not be adversely affected by the proposed joint administration. In fact, the rights of all creditors will be enhanced by the reduction in administrative costs resulting from joint administration.

#### NOTICE

16. As of the filing of this Motion, no trustee, examiner or creditors' committee has been appointed in these Chapter 11 cases. Notice of this Motion has been to (i) the Office of the United States Trustee for the Eastern District of New York; and (ii) to the twenty (20) largest unsecured creditors in each of the Debtors' respective cases. The Debtors submit that no other notice need be given in light of the relief sought.

17. No previous request for the relief sought herein has been made to this or any other Court.

WHEREFORE, the Debtors respectfully request that the Court enter an order pursuant to Bankruptcy Rule § 1015(b) for the joint administration of the above-captioned cases, and such other and further relief as may be just and proper.

Dated: Melville, New York  
July 14, 2011

SFERRAZZA AND KEENAN, PLLC  
Proposed Attorneys for the Debtors  
And Debtors-in-Possession

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